

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

WILLIAM A. WHITE,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 1:22-cv-02405-TWP-TAB
)	
ROBERT KENNETH DECKER, et al.,)	
)	
Defendants.)	

DEFENDANTS' PRELIMINARY WITNESS LIST

Pursuant to the Order Setting Pretrial Schedule and Discovery Deadlines entered on August 26, 2024, [[Dkt. 104 at 4, § I.G](#)], the United States of America and the Federal Bureau of Prisons (collectively "Defendants"), tender their Preliminary Witness List.

Defendants may call any of the following witnesses at trial:

1. **Plaintiff William A. White.** Plaintiff has information regarding the allegations in his Complaint, including the incidents giving rise to his alleged harms and his purported damages.
2. **Co-Defendant Robert K. Decker.** Co-Defendant has information regarding the physical altercation between he and Plaintiff on February 18, 2022. Co-Defendant also has information about the relationship between he and Plaintiff as well as other allegations by Plaintiff concerning Co-Defendant's relationship to Defendants.
3. **Correctional Officer B. Calloway.** Officer Calloway has information concerning the fight between Plaintiff and Co-Defendant on February 18, 2022, including their refusal to obey his verbal commands to cease, and the actions necessary to gain control over and separate the two of them.
4. **Correctional Officer J. Emerson.** Officer Emerson has information concerning the fight between Plaintiff and Co-Defendant on February 18, 2022, including Defendants' response to the fight and the Bureau of Prison's actions related to inmate fighting.
5. **Disciplinary Hearing Officer Jason Bradley.** Officer Bradley has information concerning Plaintiff's Disciplinary Hearings for Incident No. 3597543 (Feb. 18, 2022) and Incident No. 3556931 (Oct. 13, 2021), including the final determinations and sanctions imposed.

6. **Dr. Gina Sacchetti.** Dr. Sacchetti has information concerning Plaintiff's mental health evaluation while he was housed in the Special Housing Unit in the Communications Management Unit on June 1, 2022.
7. **Dr. A. Christianson.** Dr. Christianson was a psychologist at Terre Haute – USP between January and July 2022. Dr. Christian may have information concerning Plaintiff's mental health during his time at Terre Haute – USP, including his placement in the Special Housing Unit.
8. **Dr. Kelsey Thomas.** Dr. Thomas has information concerning Plaintiff's mental health assessment during his intake screening at FTC – Oklahoma, which occurred immediately after his transfer from Terre Haute – USP.
9. **Dr. Annabel Fields.** Dr. Fields has information related to Plaintiff's mental health needs prior to his housing at Terre Haute – USP, including his prior diagnosis for Post-Traumatic Stress Disorder.
10. **Senior Officer J. Jensen.** Officer Jensen may have information regarding Co-Defendant's Video Medical Assessments following the use of OC Spray on February 18, 2022.
11. **Todd Royer.** Mr. Royer has information concerning Plaintiff's housing during the time of the alleged events giving rise to Plaintiff's claims. He also has information concerning BOP policies and inmate transfer between institutions.
12. **Rebekka Eisele.** Ms. Eisele has information concerning Plaintiff's placement and housing during the time of the alleged events giving rise to Plaintiff's claims.
13. **Fred Roshto.** Mr. Roshto has information concerning the Bureau of Prison's policies and procedures relevant to Plaintiff's claims.
14. **Acting Intel Research Specialist Jamie Wheeler.** Ms. Wheeler may have information concerning Plaintiff's allegations of Co-Defendant's behaviors and allegations of threats of harm to Plaintiff.
15. Any persons listed on Plaintiff's Witness List, whether or not called by Plaintiff.
16. Any persons listed on Co-Defendant Robert K. Decker's Witness List, whether or not called by Co-Defendant Decker.
17. Any person needed to authenticate records.
18. Any person needed for impeachment or rebuttal purposes.

This Preliminary Witness list supplements Defendants' Disclosures. Defendants reserve the right to amend or supplement its Preliminary Witness list as permitted by the Federal Rules of Civil Procedure and Local Rules of this Court.

Respectfully submitted,

JOHN E. CHILDRESS
Acting United States Attorney

By: /s/ Traci M. Cosby
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CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2025, a copy of the foregoing *Defendants' Preliminary Witness List* was filed electronically. Service of this filing will be made on the following ECF-registered counsel by operation of the Court's electronic filing system:

None.

I further certify that on March 26, 2025, a copy of the foregoing *Defendants' Preliminary Witness List* was mailed, by first class U.S. Mail, postage prepaid and properly addressed to the following:

WILLIAM A. WHITE
13888-084
CUMBERLAND - FCI
CUMBERLAND FEDERAL CORRECTIONAL INSTITUTION
Inmate Mail/Parcels
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ROBERT K. DECKER
51719-074
MARION – USP
MARION U.S. PENITENTIARY
Inmate Mail/Parcels
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and

ROBERT K. DECKER
51719-074
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Detroit, MI 48228

/s/ Traci M. Cosby
Traci Marie Cosby
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